UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:

S
Chapter 11

POLARIS OPERATING, LLC, et al.,

Debtors

S
Case No. 23-32810 (CML)

S
(Jointly Administered)

<u>CREDITORS' RENEWED OBJECTION TO THE SALE</u> OF MASTERSON LEASES TO CONTANGO OIL AND GAS

TO THE HONORABLE JUDGE CHRISTOPHER M. LOPEZ:

Come now, Dorothy Faye Thompson, Janice Ann Beckley, J-Brex Company, Jim Wayne Thomas Revocable Trust, John S. Teutsch, Joseph C. Teutsch, Joseph Phillip Brent Trust, Phillip Brent Minerals Trust, Beth Marsh, in her capacity as Executrix of the Estate of Robert Price Brent, III, Robert Price Brent III Trust, Teutsch Partners, LLC, Tucker Burton Teutsch, III, Union Mineral Co., LLC, and Virginia Anne Teutsch Lowe (the "Creditors"), and repeat and incorporate by reference their previously-made objections to the sale of Masterson Leases to Contango. These Creditors would show the Court as follows:

- 1. On or about December 20, 2023, the Amarillo National Bank filed its Amended Limited Objection to Debtors' Sale of Assets and Adequate Assurance of Future Performance in regard to a proposed sale of certain oil and gas leases (i.e., the "Masterson Assets") to Contango Oil and Gas. [Doc. 248]. On December 22, 2023, the Creditors adopted Amarillo National Bank's Amended Limited Objections. [Doc 258].
- 2. In regard to the Debtors' Emergency Motion for an Order Modifying the Masterson Sale Order [Doc. 404] and Notice of Status Hearing [Doc. 410], the Creditors renew and incorporate by reference their previously-made objections to the sale of the Masterson Leases to

Contango Oil and Gas [Doc. 258], and again incorporate by reference Amarillo National Bank's Amended Limited Objection to Debtor's Sale of Assets [Doc. 248].

WHEREFORE, these Creditors pray that the Court take due notice of their objections to the sale of the Masterson Assets to Contango Oil and Gas.

Respectfully submitted,

Fax: (806) 379-7171

LOVELL ISERN & FARABOUGH, LLP
John H. Lovell, TX SBN 12609300
john@lovell-law.net
Brian W. Farabough, TX SBN 24072989
brian@lovell-law.net
Matthew S. Merriott, TX SBN 24100846
matthew@lovell-law.net
112 SW 8th Ave, Ste 1000
Amarillo, TX 79101
Phone: (806) 373-1515

By: /s/ John H. Lovell
John H. Lovell

CERTIFICATE OF SERVICE

This is to certify that on this 11th day of September 2024, I have electronically filed the foregoing using the Court's CM/ECF filing system, which sends a notice of this filing and an accompanying link to this filing to all parties who have filed a notice of appearance in this case under the Court's CM/ECF system.

/s/ John H. Lovell John H. Lovell